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Attorneys for Defendant  
DERRICK PATTERSON

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DERRICK PATTERSON,

Defendant.

Case No. 22-CR-155-JFW

**UNOPPOSED EX PARTE  
APPLICATION TO CONTINUE  
SENTENCING HEARING**

[CURRENT] Hearing Date: October 7,  
2022 at 8:00 a.m.

[PROPOSED] Hearing Date: October 24,  
2022 at 8:00 a.m.

Derrick Patterson, by and through his counsel of record, Deputy Federal Public Defender Adithya Mani, hereby applies *ex parte* to this Honorable Court for an order 1) continuing the sentencing hearing from October 7, 2022 at 8:00 a.m. to October 24, 2022 at 8:00 a.m. and 2) continuing the deadline for sentencing positions from September 16, 2022 to October 3, 2022. The government does not oppose this request.

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**DECLARATION OF ADITHYA MANI**

I, Adithya Mani declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am appointed to represent Mr. Patterson in this matter. I am licensed to practice law in the State of California and I am admitted to practice in this Court.

2. Mr. Patterson was charged by indictment with six counts of bank fraud, in violation of 18 U.S.C. § 1344(2); three counts of Hobbs Act Robbery, in violation of 18 U.S.C. § 1951(a); and two counts of aggravated identity theft, in violation of 18 U.S.C. § 1028A. (Dkt. 12.)

3. On April 5, 2022, Mr. Patterson initially appeared on a complaint and was ordered permanently detained. (Mins. of Proceedings, Dkt. 5.)

4. On July 12, 2022, Mr. Patterson pled guilty to Counts 7 and 10 of the Indictment and sentencing was set for September 19, 2022 at 8:00 a.m. (Mins. of Change of Plea, Dkt. 34.)

5. On August 15, 2022, the United States Probation and Pretrial Services Office filed its disclosed recommendation letter and presentence report. (Dkts. 35, 36.)

6. On August 17, 2022, the parties submitted a stipulation to continue the sentencing hearing, in part due to the significant legal issues regarding the application of the federal sentencing guidelines to this case. (Dkt. 37.)

7. On August 22, 2022, the Court granted the parties' stipulated request and continued the sentencing hearing to October 7, 2022 at 8:00 a.m., with position papers due on or before September 16, 2022.

8. I had planned to meet with Mr. Patterson at MDC Los Angeles ("MDC") during the morning on September 14, 2022 to discuss our sentencing position before the September 16, 2022 filing deadline.

9. On September 13, 2022, I was informed that MDC instituted an emergency lockdown. Late in the morning on September 14, 2022, I was informed that

1 MDC had ended this lockdown and would permit legal visits starting at noon. Because  
2 of my scheduled court hearings during the remainder of this week, however, I may be  
3 unable to meet with Mr. Patterson before the deadline to file sentencing positions.

4 10. On September 14, 2022, I conferred with AUSA Jeremiah Levine, who  
5 informed me that the government does not oppose this request.

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7 I declare under penalty of perjury under the laws of the United States of America  
8 that the foregoing is true and correct.

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10 Executed on September 14, 2022, at Los Angeles, California.

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12 /s/ ADITHYA MANI  
13 ADITHYA MANI  
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